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August 31, 1993

By Hand Delivery

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: **Ex Parte Presentation**
GEN Docket No. 90-314
ET Docket No. 90-100

Dear Mr. Caton:

Pursuant to 1.1206(a)(1) of the Commission's Rules, Cincinnati Bell, Inc., Illinois Consolidated Telephone Co., Rock Hill Telephone Co. and Shenandoah Telecommunications Co. ("the Companies") hereby submit two copies of the attached ex parte presentation.

The primary goal of these independent telephone companies is to assure that small and medium size telephone companies are not excluded from participation in PCS in their home areas by virtue of attribution of their relatively insignificant cellular investments. Their proposal would permit PCS entry by entities with noncontrolling investments in in-region cellular MSAs and would not exclude entities on the basis of any RSA cellular interests. In the attached paper this primary objective is placed into a framework which the Companies understand is being considered as a possible compromise to permit PCS to move forward expeditiously.

Respectfully submitted,

Joel S. Winnik

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Counsel for
Cincinnati Bell, Inc.
Illinois Consolidated Telephone Co.
Rock Hill Telephone Co.
Shenandoah Telecommunications Co.

Attachment

Cincinnati Bell, Inc., Illinois Consolidated Telephone Co., Rock Hill Telephone Co. and Shenandoah Telecommunications Co., all independent telephone companies, express their support for the following PCS framework:

Major Trading Areas ("MTAs")

Open to all bidders except an entity that has a direct or indirect controlling interest in an MSA cellular licensee in an MTA. Such entity may not hold any interest in any MTA licenses for that MTA.

1 40 MHz MTA License

2 20 MHz MTA Licenses

- May aggregate the two 20 MHz MTAs

Basic Trading Areas ("BTAs")

1 20 MHz BTA license

- Open to rural telephone companies, small businesses, minorities and women

1 20 MHz BTA license

- Open to all bidders including in-region cellular companies
- May be aggregated with the other 20 MHz BTA so long as in-region cellular interest in the combination is no greater than 50%

This framework will permit licensees of small cellular systems and small investors in larger cellular systems to participate in MTA ventures encompassing the cellular licensees' service area. Further, this approach will

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permit an entity controlling an MSA cellular license in an MTA to build out the equivalent of that MTA by obtaining PCS licenses on a BTA-by-BTA basis, but that entity will not be permitted to participate in an MTA license for that MTA. Control of an RSA cellular license should not be a basis for exclusion from PCS spectrum.

The framework is an appropriate industry-wide compromise that will give independent telephone companies the opportunity to enhance their operations with PCS wireless technology, permit today's cellular companies to bring their unique experience to the PCS field, pave the way for other new entrants into the wireless industry, and avoid excessive concentration of licenses.

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